



Oregon

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September 8, 2000

Mr. Patrick L. Jones
Multnomah County
Department of Environmental Services
2505 SE 11th
Portland, OR 97202

RE: No Further Action Determination
St. Johns Health Clinic Site
Multnomah County
Portland, Oregon
ECSI No. 2421

Dear Mr. Jones:

The Department of Environmental Quality (DEQ) Voluntary Cleanup and Portland Harbor Section completed our review of the information submitted to-date regarding the Multnomah County St. Johns site located northwest of the intersection of North New York Avenue and Lombard Street in Portland, Oregon. The site consists of two contiguous parcels located at 7321 North New York Avenue (Parcel 2) and 9014-9020 North Lombard Street (Parcel 4). Multnomah County is the current site owner.

Multnomah County entered DEQ's Voluntary Cleanup Program (VCP) under the independent cleanup pathway (ICP) on October 7, 1999 by signing an agreement for oversight and review of the investigation and cleanup activities related to five ~~(5)~~ on-site underground storage tanks (USTs). The independent cleanup action was evaluated by DEQ to assess if the action met the requirements of Oregon Revised Statutes (ORS) 465.200 through 465.455 and Oregon Administrative Rules (OAR) Chapter 340, Division 122, Sections 010 to 115.

DEQ reviewed the existing environmental information for the site and concluded that the investigation and cleanup of the site are complete and that the site does not present a significant threat to human health or the environment. It is DEQ's determination that no further action (NFA) is required at the site. The basis for the NFA is presented in DEQ's Staff Report, dated July 18, 2000. Our understanding of the site is summarized below:

1. In late 1996, soil borings were advanced near five on-site underground storage tanks (USTs). Tetrachloroethene (PCE) and trichloroethene (TCE) were detected in soil at concentrations up to 790 milligrams per kilogram (mg/kg).

2. Five USTs were removed from the site in June 1999. Prior to tank removal, the tank contents were characterized and disposed of. Total petroleum hydrocarbons (TPH) and volatile organic compounds (VOCs) were detected on both parcels. Over-excavation of contaminated soils was not conducted during the tank removal activities. The maximum PCE concentration detected in soil during tank removal activities was 326 mg/kg. TPH was detected at concentrations up to 7,250 mg/kg. In July 1999, the nature and extent of VOC contaminated soil was determined using eighteen (18) Geoprobe® borings. Groundwater was not encountered and is not believed to have been impacted by site activities.
3. Soil removal activities were conducted in November 1999. Approximately 900 cubic yards of contaminated soil were excavated and transported offsite for thermal treatment and disposal. VOCs were not detected above laboratory method reporting limits in six soil confirmation samples collected from the excavation on Parcel 2. Thirteen soil confirmation samples collected from the excavation on Parcel 4 samples had PCE concentrations below the DEQ's Numerical Soil Cleanup Level of 300 micrograms per kilogram ($\mu\text{g/kg}$). One sample, collected from a depth of 15 feet, had a PCE concentration of 547 $\mu\text{g/kg}$. VOCs other than PCE were detected in at least one Parcel 4 soil confirmation sample. These included 1,2,3-trichlorobenzene, 1,2,4-trichlorobenzene, 1,2-dichlorobenzene, 1,4-dichlorobenzene, hexachlorobutadiene and carbon disulfide. The maximum concentration of these VOCs was 205 $\mu\text{g/kg}$. TPH was detected generally at concentrations less than 200 mg/kg.
4. The cleanup is considered protective of human health and the environment, because source area soils have been removed, and residual concentrations meet acceptable risk levels (i.e., 10^{-6} excess cancer risk for individual carcinogens). Oregon Numerical Soil Cleanup Rules and Numerical Soil Cleanup levels (OAR 340-122-045) were used as preliminary cleanup goals during the soil removal. The site meets the definition of a "simple site" as defined in these rules. PCE was determined to be the primary contaminant of concern at the site. The concentration of PCE remaining at the site following the soil removal was evaluated using 90th percentile upper confidence level (UCL) concentration and was estimated to be about 30 $\mu\text{g/kg}$. The 90th percentile UCL concentration is less than DEQ's Numerical Soil Cleanup Value of 300 $\mu\text{g/kg}$. In addition, residual PCE concentrations are less than the calculated risk based cleanup concentrations for the protection of occupational workers (i.e., indoor and outdoor air inhalation).
5. The soil cleanup action is considered effective, permanent, and will be reliable long-term, since the source areas were removed and no long-term management is needed to assure protection of human health. The removal of contaminated soils reduces the possibility of VOC migration to groundwater, and minimizes the potential for vapor migration into outdoor air or indoor air at the site. The new health center building and an asphalt parking lot will be constructed over the residual contamination and will minimize the potential for future trench workers to encounter the contamination (i.e., residual contamination is in general greater than 12 feet below ground surface). Residual VOC concentrations are expected to decrease over time.

6. A Public Notice regarding the proposal to issue a "no further action" letter was published on August 1, 2000 with the public comment period ending September 1, 2000. No comments were received.

DEQ's NFA determination will not be applicable if new or undisclosed facts show that the investigation and cleanup does not comply with the referenced rules. We recommend that a copy of all information be maintained with the permanent site records.

DEQ files and the Environmental Cleanup and Site Information (ECSI) database will be updated to reflect the No Further Action determination. If you have questions, please feel free to contact DEQ's project manager, Rod Struck, at (503) 229-5562. Thank you for your participation and cooperation in DEQ's Voluntary Cleanup Program.

Sincerely,



Michael E. Rosen
Manager, Northwest Region
Voluntary Cleanup and Portland Harbor

Cc: Michael McBride, Multnomah County
Jim Anderson, DEQ/NWR/VCPH
Rod Struck, DEQ/NWR/VCPH
Nick Varnum, PNB Environmental, Inc.